

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

ILLINOIS EPA PUBLIC HEARING

Clean Air Act Permit Program (CAAPP) Draft Permit
The Premcor Refining Group, Inc.
Hartford Distribution Center

Date: July 13, 2004

Time: 7:00 p.m.

Place: Village of Hartford Recreational Building
715 North Delmar
Hartford, Illinois

REPORTED BY:
MITCHELL & MCNEIL REPORTING
Tammie M. McNeil, CSR, RPR
CSR# 084-002798
P.O. Box 654
Salem, IL 62881
(618) 548-6009

1 MR. MATOESIAN: We're going to go ahead and
2 start. Good evening, ladies and gentlemen. My name is
3 Charles Matoesian. I will be the hearing officer
4 tonight. This hearing is being held by the Illinois
5 Environ -- this is being held by the Environmental
6 Protection Agency, Bureau of Air, concerning the
7 proposed issuance of a Clean Air Act Permit Program
8 permit, or CAAPP permit, for the Premcor Refining Group
9 in Hartford.

10 The Premcor Refining Group has requested that
11 the Illinois Environmental Protection Agency issue a
12 Clean Air Act Permit Program permit for its Hartford
13 Distribution Center located at 201 East Hawthorne in
14 Hartford. The Hartford Distribution Center is petroleum
15 bulk storage and loading terminal. The CAAPP is
16 Illinois' operating permit program for major sources of
17 emissions, as required by Title V of the Clean Air Act.
18 The conditions of CAAPP permits are enforceable by the
19 public, as well as by the United States Environmental
20 Protection Agency and the Illinois Environmental
21 Protection Agency. CAAPP permits may contain new and
22 revised conditions established under permit programs for
23 new and modified emission units, pursuant to Title I of
24 the Federal Clean Air Act, thereby making them combined

1 Title V and Title I permits.

2 The purpose of this hearing is to receive
3 comment and answer questions from the public prior to
4 making a final decision concerning the draft permit.
5 And one clarification here, the public notice
6 erroneously stated there were two draft permits. That
7 was a mistake. There's only one permit, the draft CAAPP
8 permit.

9 This hearing is being held under the Illinois
10 EPA's Procedures for Permit and Closure Plans,
11 regulations found at 35 Illinois Administrative Code,
12 Part 166, Subpart A. Lengthy comments and questions
13 should be submitted in writing. Written comments must
14 be sent to myself, the hearing officer, and be
15 postmarked by midnight, August 12th, 2004. Written
16 comments need not be notarized. Again, send those
17 comments to myself, Charles Matoesian, Hearing Officer,
18 Division of Legal Counsel at the Illinois EPA, 1021
19 North Grand Avenue East, Springfield, Illinois, 62794-
20 9276, and this information is available on the sheet at
21 the check-in table.

22 After I speak -- after my introduction, that
23 is, there will be a presentation by Mr. Dan Punzak,
24 Acting Permit Unit Manager and Refinery Specialist for

1 the Bureau of Air, and by Mr. Sinil Suthar, Draft CAAPP
2 Permit Reviewer.

3 On behalf of Renee Cipriano, Director of the
4 Illinois Environmental Protection Agency, the Bureau of
5 Air, and the Agency itself, I thank you all for coming,
6 and now Mr. Punzak will speak.

7 MR. PUNZAK: Good evening. Thank you again for
8 coming to tonight's hearing. I am going to provide some
9 general background information for tonight's hearing;
10 however, first I want to stress that we are here to
11 discuss an operating permit for Premcor's Hartford
12 Distribution Center. As an operating permit, this would
13 not address or authorize construction of any new
14 emission units to the operation.

15 This operating permit would be issued pursuant
16 to Title V of the Federal Clean Air Act, which created a
17 federal operating permit program for major sources of
18 emissions. Nationally, this program is known as the
19 Title V or Part 70 Permit program. In Illinois, this
20 program is known as the Clean Air Act Permit Program.
21 The acronym is CAAPP, pronounced cap. The terms CAAPP
22 and Title V are synonymous in Illinois, and we often use
23 these two terms interchangeably in Illinois when
24 referring to these permits.

1 I want to share with you what the United States
2 EPA says about the Title V permit. Quote, "The purpose
3 of Title V permits is to reduce violations of air
4 pollution laws and improve enforcement of those laws,"
5 unquote.

6 Title V of the Clean Air Act achieves its
7 objectives first by requiring that each major source to
8 be covered by a comprehensive single permit that
9 addresses all the emission units and activities at the
10 source. Before Title V, a major source in Illinois
11 could have several operating permits, each one
12 addressing different operations at the source.

13 Second, Clean Air Act permits must be
14 comprehensive, addressing all applicable air pollution
15 control requirements. This will improve the awareness
16 and understanding of the emission standards that apply
17 to a source and the various compliance procedure with
18 these standards that a source must carry out. Given the
19 complexity of the state and federal requirements for air
20 pollution control, it is widely accepted that a
21 comprehensive permit will facilitate compliance by a
22 major source, as that permit summarizes and acts to
23 guide -- as guide to the various requirements that apply
24 to the source. This is certainly very important for the

1 general public who may be unfamiliar with the rules that
2 apply to a source. A comprehensive permit is certainly
3 important for the various management and operating
4 personnel at a source, so that obligations are
5 understood and nothing is neglected or overlooked. A
6 comprehensive permit is also important for the staff of
7 the Illinois EPA as it facilitates a thorough and
8 consistent approach into various activities that we
9 undertake to verify and track compliance.

10 Third, Clean Air Act permits add to the
11 compliance checks put on a source, thereby providing
12 additional protection of our air quality. As such, the
13 public should generally endorse the issuance of these
14 permits, especially for sources with which they have
15 concerns about emissions. Quite simply, air quality is
16 better protected if a major source is covered by a Clean
17 Air Act permit.

18 One comprehensive benefit of Clean Air Act
19 permits is gap filling. Clean Air Act permits can fill
20 in gaps in the record keeping and other compliance
21 procedures contained in existing rules, requiring
22 sources to carry out additional procedures to show
23 compliance with applicable control requirements. This
24 is particularly important for some of the older air

1 pollution control rules, where emission control
2 requirements were adopted where rule making did not
3 address or specify any associated compliance procedures.

4 The other major compliance benefit of Clean Act
5 Permits is additional reporting by a source related to
6 compliance. Effectively, Clean Air Act permits make
7 sources publicly accountable for their compliance
8 status. This is first accomplished by requiring a
9 source to promptly report all deviations from applicable
10 requirements. Depending on the nature and significance
11 of the deviations, reporting may be required
12 immediately, within 30 days, or in a regular quarterly
13 or semi-annual compliance report. Second, sources are
14 held directly accountable for their compliance status
15 because on an annual basis, they must submit a
16 compliance certification. This requires a source to
17 review its compliance status during the previous year
18 and formally report its findings, including a
19 determination whether each permit unit was in full
20 compliance, intermittent compliance, or noncompliance
21 during the previous year.

22 Accordingly, issuance of a Clean Air Act permit
23 to Premcor's Distribution Center is a good thing. A
24 permit would help assure that this plant fully complies

1 with the existing limits and other regulatory
2 requirements that restrict its emissions. A permit will
3 do this by summarizing emission control requirements in
4 a single comprehensive -- in a single comprehensive
5 permit, clarifying the provisions of certain rules,
6 filling in certain gaps in the compliance procedures in
7 existing rules, and requiring additional reporting
8 related to compliance. We are certainly interested in
9 any suggestions that you may have to improve the permit
10 in this regard. However, it should be understood that
11 plants like this plant are already some of the most
12 closely monitored sources in the state, with continuous
13 emission monitors already in place for various
14 emissions, particularly volatile organic materials.

15 At the same time, the Clean Air Act permit for
16 this distribution center is not a means to generally set
17 new requirements to control emissions from this source.
18 We do not have broad legal authority in Clean Air Act
19 permits to establish new requirements to further control
20 emissions from existing sources. Instead, the
21 development of control requirements for existing
22 sources, like this distribution center, generally occurs
23 with the adoption of new laws and rules. This ensures
24 that all sources in a particular category are considered

1 and treated fairly and that overall environmental goals
2 are efficiently achieved.

3 As a final topic with respect to tonight's
4 hearing, we are here to provide you with information.
5 More importantly, we are here to listen to your comments
6 and concerns. Your comments can and often do affect the
7 content of permits. So please, make your concerns known
8 to us. Following consideration of your comments, we
9 will prepare a revised permit, known as a proposed
10 permit, which will be sent to the USEPA for its review.
11 It is very important that you state your concerns,
12 either at this hearing or in written comments, so that
13 as possible and legally allowed, we can address them in
14 the proposed permit. When USEPA reviews the proposed
15 permit, USEPA will also be interested in seeing your
16 comments and how we address them. This is only possible
17 if you state any concerns that you may have either here
18 tonight on the hearing record, or alternatively, send
19 the comments to us in writing prior to the close of the
20 comment period. This is also necessary to establish
21 your rights should you eventually wish to object to the
22 permit issued to this operation.

23 That concludes my opening remarks. I'd now
24 would like to turn the microphone over to Sinil Suthar

1 to provide a brief description of the Hartford
2 Distribution Center.

3 MR. SUTHAR: Good evening. My name is Sinil
4 Suthar, and I'm the permit analyst out of the Bureau of
5 Air, and I was assigned to draft the Title V permit for
6 Premcor, the Hartford Distribution Center. I think the
7 best way to proceed is just to kind of walk you through
8 this document and tell you where things are at that you
9 can look for or maybe you have already noticed that you
10 want to discuss.

11 Table 2 starts out with a Table of Contents,
12 and to make things short and sweet, basically, what you
13 probably want to look for or look at are -- the most
14 important things would be in all of the unit 7's, 7.1,
15 7.2, all the way through to 7.8, as they're laid out in
16 the permit. Everything outside of the section 7's is
17 what we call boiler plate language. It's -- it's pretty
18 much the same in every Title V permit that you pick up,
19 either for this facility or other facilities around the
20 state. So the most -- the meat of this -- this meal, if
21 you will, is in the unit 7's, from 7.1, all the way
22 through 7.8. Basically, all the emission units that the
23 facility provided an application for that they wanted
24 permitted are located all in Unit 7.

1 Starting -- starting off with Unit 7.1, the
2 vapor control system for the facility is documented
3 there, with the control of the thermal treatment unit
4 or --

5 MS. ANDRIA: Can you step back from the mic?

6 MR. SUTHAR: Too close, okay. So 7.1 is the
7 vapor control system, and its control is the thermal
8 treatment unit or enclosed flare.

9 Unit 2, or 7.2, is the actual river dock or
10 marine vessel loading system. And, of course, the
11 control for this unit is vapor recovery unit.

12 7.3 is external floating roof tanks, and there
13 may be several tanks within 7.3, and you can look at the
14 description going all the way to 7.3, it lays out how
15 many tanks and other details of descriptions of the
16 tanks. Of course, the controls, the floating roof,
17 double seals and submerged loading exist for 7.3.

18 7.4 deals with internal floating roof storage
19 tanks. Once again, there may be more than one tank
20 located in this unit. If you look at the description,
21 again, on 7.4, it will tell you how many units there
22 are. Once again, the controls for each are the floating
23 roof and seals, permanent submerged loading.

24 7.5 deals with the wastewater treatment system

1 of the facility.

2 7.6 deals with fugitive emissions from paved
3 and unpaved roadways.

4 7.7 deals with fugitive VOM emissions from
5 leaking river dock flare components. And the control
6 for this unit in 7.7 is a program what's called the Leak
7 Detection and Repair Program.

8 7.8 deals with gasoline storage tanks at the
9 facility. Once again, there may be more than one, and
10 that is the bare -- that is the meat, if you will, of
11 this meal.

12 Looking at the other sections, Section 5 of
13 this document, if you go down the Table of Contents, it
14 will describe -- has a source description, some
15 applicable regulations, some non-applicability
16 regulations.

17 If you go down and just look, it's all pretty
18 self-explanatory. Once again, everything outside of
19 Section 7's is general boiler plate language that is
20 included in all of our Title V permits.

21 One thing I can -- one more thing I would like
22 to do, if I could, is if you look at 7.1, just to kind
23 of guide you through all the Section 7's, the details of
24 all the Unit 7's, they're laid out in a way that in the

1 beginning, 7.1 would be a description of each unit.

2 7.2 lists each unit and the year that they were
3 constructed, and that's important because it would tell
4 us what rules and regulations might apply, depending on
5 when it was constructed.

6 7.1.3, once again, this applies to all the Unit
7 7's, 7.2.3 is going to be labeled the same way. 7.1.3
8 is applicability provisions and applicable regulations.
9 That deals with any state or federal rules that apply to
10 the facility or this particular unit, depending on when
11 it was constructed, the year it was constructed.

12 7.1.4 deals with non-applicability of
13 regulations.

14 7.1.5, once again, in all the other units,
15 7.2.5, 7.3.5, whatever that unit corresponds to, it
16 tells you about the operation and production limits and
17 word practices.

18 7.1.6 or 7.2.6, for whichever unit, deals with
19 emission limitations, and these are the limitations we
20 have set, once again, based on the date of construction
21 of that particular unit and which rules and regulations
22 apply to that unit.

23 7.1.7, deals with operating requirements. And
24 once again, those requirements come from either state

1 regulations or federal regulations that apply to that
2 particular unit.

3 7.1.8 deals with the monitoring requirements.
4 Same thing, these often come from the regulations,
5 whether they be state or federal.

6 Record keeping requirements is 7.1.9.

7 7.1.10, deals with reporting requirements that
8 the facility has to submit to the Agency.

9 7.1.11, any operational flexibility/
10 anticipated operating scenarios. Of course, there's
11 nothing in this unit for that. Sometimes that can vary,
12 depending on what unit we're talking about. There is
13 some room for play, depending on certain situations.
14 And once again, that's on a case by case basis. We'll
15 fill in information in 7.1.11 only after we've
16 determined that it's pertinent, and it's okay to do so.

17 7.1.12 is the compliance procedures that that
18 particular unit would have to demonstrate or have to
19 tell us what type of emissions they have using these
20 procedures, whether they be emission factors, whether
21 they be specific formulas from out of guidance from the
22 USEPA.

23 Basically, that is -- that is the essential
24 part of the Title V permit. And once again, each --

1 each Unit 7 deals with whatever particular piece of
2 equipment or emission unit that this facility would like
3 to have permitted in this permit, and that's the way I
4 have drafted this permit is based on the application
5 that I received from the facility.

6 I think I wanted to stop there for right now.
7 If there are any questions, we can possibly go ahead and
8 talk about some of the things in the permit that you
9 want to discuss or you might have questions about, and
10 any one of us will try to answer those questions.

11 MS. ANDRIA: Can we ask our questions, if we
12 have a number of questions, can we wait until we start
13 our comments?

14 ARBITRATOR MATHIS: Yes.

15 MR. SUTHAR: Sure.

16 ARBITRATOR MATHIS: Thank you. We'll open the
17 floor to public comments now, starting with Mr. Steve
18 Mulkey from Premcor, who will make a short statement.

19 If you wish to make statements or ask
20 questions, please go to the microphone in the middle of
21 the room and state and spell your name for the record.
22 Thank you.

23 MR. MULKEY: Good evening. My name is Steve
24 Mulkey, that's M-u-l-k-e-y.

1 ARBITRATOR MATHIS: Can you --

2 MR. MULKEY: Can you not hear me? Is that
3 better?

4 Okay. I'm currently the environmental
5 remediation manager for the Premcor Refining Group. My
6 office is located at Premcor's Hartford Distribution
7 Center. I'd like to start off by thanking the Illinois
8 Environmental Protection Agency for the opportunity to
9 offer this statement regarding the final draft of the
10 Clean Air Act Permit Program permit for Premcor's
11 Hartford Distribution Center.

12 Premcor has been working with the Illinois EPA
13 for a number of years toward the successful issuance of
14 this permit for our existing operations, and will
15 continue to work with the Agency to ensure the goals of
16 this permit are accomplished.

17 Premcor's Hartford Distribution Center has been
18 in existence since the refinery shut down in October
19 2002. The Hartford Distribution Center is a petroleum
20 bulk storage and loading terminal. We currently have
21 about 25 company employees at Hartford that either work
22 at the terminal, or like myself, have an office at the
23 terminal. In addition, we typically employ 15 to 20
24 full-time contractors at the site.

1 We continue to make improvements to our
2 facilities. In the past year, we have spent
3 approximately 1 million dollars making improvements to
4 the wastewater treating unit at the Hartford
5 Distribution Center. We believe the operations covered
6 by this permit will continue to have a positive economic
7 impact on the Hartford community as a whole and for our
8 employees, our contractors, and their respective
9 families.

10 Further, this permit includes requirements for
11 the continued use of extensive pollution control
12 equipment, along with monitoring, record keeping and
13 reporting requirements, resulting in protection of human
14 health and the environment.

15 In conclusion, the Premcor Refining Group
16 requests finalization in granting the final draft permit
17 for the Hartford Distribution Center. This permit is
18 critical to the survival of the Hartford Distribution
19 Center and the continued supply of petroleum products to
20 this region. It is also of great importance to our
21 employees, local businesses, labor unions, the
22 surrounding community, who depend on the facility as a
23 tax base, and the Village of Hartford.

24 We at Premcor look forward to and are committed

1 to continuing to work with the Illinois EPA and the
2 Hartford community towards the issuance -- issuance of
3 this permit and the successful continued operation of
4 this facility.

5 Again, we thank the Agency for the opportunity
6 to comment at this hearing, and thank the members of the
7 public for taking time to participate in this process.
8 Thank you.

9 MR. MATOESIAN: Thank you, Mr. Mulkey. The
10 next speaker I have listed is Kathleen Logan Smith.

11 MS. SMITH: I'll wait.

12 MR. MATOESIAN: You'll wait, okay. The next
13 speaker, then, is Kathy Andria.

14 MS. ANDRIA: I would like to defer to the
15 residents of Hartford.

16 MR. MATOESIAN: Is there anyone from Hartford
17 who would like to speak first?

18 I have Jim Bensman from Wood River, that's
19 close, if you would like to speak now.

20 MR. BENSMAN: No, I'll wait.

21 MR. MATOESIAN: All right. We're back to the
22 beginning, Kathleen Logan Smith.

23 MR. MATOESIAN: Okay. Kathy Andria will go.

24 MS. ANDRIA: Would it be okay if I kind of move

1 this up to the table so I can put my things down?

2 MR. MATOESIAN: That's fine.

3 MS. ANDRIA: Can you hear me? Okay. First, I
4 wanted to say my name is Kathy Andria, K-a-t-h-y,
5 Andria, A-n-d-r-i-a, sorry, I forget, I'm with the
6 American Bottoms Conservancy. We are based in St.
7 Louis, and we all work on environmental issues from
8 Alton, down to the tip of the Kaskaskia River.

9 We very much support the Title V program, and
10 we think that there is nothing more important than
11 having sources and emissions publicly enforceable, and
12 we want to thank Director Cipriano for agreeing to have
13 a hearing on this -- in this because the -- any kinds of
14 emissions, especially refinery emissions, or any kinds
15 of emissions petroleum related in this particular town
16 are taken very seriously.

17 I have a kind of a combination of questions to
18 ask, and I tried to organize it, but as usual, your
19 organization is in your intention more than it is in
20 reality. But first of all, I would like to -- to ask
21 how -- how this permit that is -- that we have in front
22 of us today is different from the one that was proposed
23 and first introduced as the Title V permit? I think it
24 was by Clark at that time. I've got some specific

1 questions. I don't want you to go point by point, but I
2 thought maybe you could give me kind of a general idea
3 of, have there been changes, and if there is so, why
4 were they made.

5 MR. SUTHAR: Can we go by your points, because
6 I've drafted so many permits in between then that I
7 don't --

8 MS. ANDRIA: I understand.

9 MR. SUTHAR: I cannot remember what the changes
10 would be.

11 MS. ANDRIA: Okay.

12 MR. SUTHAR: So since you've got the changes,
13 can we go ahead and go through those?

14 MS. ANDRIA: Well, I don't really have all of
15 the changes, but I did get a copy of the old permit, and
16 I noticed that the --

17 MR. SUTHAR: This was drafted by me, also?

18 MS. ANDRIA: Pardon?

19 MR. SUTHAR: My name -- I drafted this one,
20 also?

21 MS. ANDRIA: Yes.

22 MR. SUTHAR: Okay.

23 MS. ANDRIA: It's -- I don't have a date, but
24 it's -- it's different from the one that was -- that

1 we're dealing with today, and one of the things that we
2 noticed was 7.1.3.

3 MR. SUTHAR: Yes.

4 MS. ANDRIA: The applicability provisions and
5 applicable regulations, No. a has been modified, and I
6 was wondering if you could tell us, since it is --
7 concerns the vapor control system, if you could tell us
8 what the reason was.

9 MR. SUTHAR: 7.1.3a?

10 MS. ANDRIA: Yes.

11 MR. SUTHAR: In my copy that I am looking at
12 here, the most recent draft, basically, 7.1.3a is
13 reserved just as a -- more of a description, if you
14 will, of the unit. And, basically, I start out
15 addressing that this is --

16 MS. ANDRIA: Okay. In the copy that I -- that
17 I have from today that I just got, the old copy, it
18 said, an affected vapor control system is the wastewater
19 treatment system, and today it's the vapor control
20 system, and I was wondering, is the wastewater treatment
21 system no longer part of this, the vapor control for
22 this?

23 MR. SUTHAR: Well, I think what I did in this
24 particular draft is I separated that out. I have a

1 separate section for the wastewater treatment system,
2 and then I think the one you're looking at, there was
3 also a typo in what you're looking at, that's why that
4 information was changed. There was some information
5 that overlapped and just got -- it was a typo.

6 MS. ANDRIA: Well, there's a whole other
7 section. It looks -- it appears that b and c were
8 removed totally, and now there's just a and b, but I
9 guess -- I guess I want to ask, is this vapor control
10 system responsible for controlling the vapors that are
11 associated with the underground leaking in a plume,
12 however it's described, for this area?

13 MR. SUTHAR: That's what I have gathered from
14 the application. And in the first sentence of 7.1.1,
15 Operation of a vapor control system that captures and
16 removes hydrocarbon vapors from the vadose zone (below
17 the ground surface), so I believe what you're saying,
18 that's what we're talking about.

19 MS. ANDRIA: Okay. And is this the same vapor
20 control system, then, that was in existence before or is
21 it a different vapor control system?

22 MR. SUTHAR: Yeah, it should be the same one.
23 Should be the same that we're talking about.

24 MS. ANDRIA: Is it the same size?

1 MR. SUTHAR: Should be, should be. All the
2 specifications should be the same from permit to permit.
3 If we have new equipment, then we're talking about new
4 equipment. We're talking about construction of new
5 equipment. We're talking about a whole other realm of
6 permitting. So we should be moving from -- I mean, if I
7 had this unit in the last permit or just a regular state
8 permit, then what I should have brought into this
9 Title V is the same unit. It's the very same one.

10 MS. ANDRIA: The gentleman who was here from
11 Premcor, does he agree to that, that that's correct?

12 MR. MULKEY: Yes, I do.

13 MS. ANDRIA: And this was constructed in '92?

14 MR. SUTHAR: Yes, ma'am. According to the
15 application, that's the date that I have, yes.

16 MS. ANDRIA: And there has been no changes or
17 modification to that since the EPA and the agreement
18 to -- to treat -- to deal with the groundwater, that
19 that hasn't been changed in response to that?

20 MR. SUTHAR: As far as permitting goes, and I'm
21 aware of, there hasn't been. There could have been --
22 there could have been things that they did to better --
23 I'm not sure what the other details would be. But as
24 far as permitting is concerned, I have no knowledge that

1 this has changed.

2 MS. ANDRIA: But if there had been changes and
3 it had been increased in response to the EPA and the
4 agreement with the parties involved, then would that not
5 trigger new source review?

6 MR. SUTHAR: I would have been notified of
7 that. Now what's -- can you give me some specifics on
8 what you're talking about as far as change goes? I
9 mean, that's a general term you're using, but what were
10 you --

11 MS. ANDRIA: Well, in 1992, as far as I know,
12 there was not an agreement with USEPA and the other
13 parties that have entered into a consent decree or an
14 agreement, or I don't know how it's characterized, to
15 deal with the fumes and the underground plume. And
16 since this is the unit that is taking care of that, and
17 since there has been a lot of work characterizing it,
18 trying to develop it, it seems unusual to me that it's
19 the same size as it was in '92. In fact, I have
20 information that it is not, and that's what my point is.

21 MR. CAHNOVSKY: Dan, I can address that. My
22 name is Chris Cahnovsky. I'm with the Illinois EPA's
23 Bureau of Land of the Collinsville Regional Office. I'm
24 the project manager for the Hartford ground water, and

1 Kathy is referring to the current vapor recovery system,
2 which consists of 12 underground vapor recovery wells
3 that are connected to a thermal treatment unit at the
4 Premcor refinery.

5 Under the current administrative order on
6 consent entered into between Premcor Refining Group,
7 Equilon, LLC, d/b/a Shell Products USA, and Atlantic
8 Richfield Oil Company, the AOC requires the oil
9 companies to replace the 12 vapor recovery wells with
10 new wells that have a greater zone of influence. It is
11 requiring -- and they have proposed to expand the
12 current thermal treatment unit and put another unit in,
13 but none -- none of this has been done yet. It's all on
14 paper. It's all being proposed. It has been approved
15 by the USEPA. The equipment is being purchased, but the
16 only thing that has been done to the unit since 1992 is
17 general maintenance, replacement of some flame arrestors
18 which were clogged, which needed to be replaced, some
19 upgrades of some software, the replacement of one well
20 through a pilot study, it's the well over here on Birch
21 Street, and that was replaced with a new well, and
22 that's about it.

23 MS. ANDRIA: Will the -- when they install
24 that, will there be a permit applied for?

1 MR. CAHNOVSKY: They'll have to go -- I assume
2 so, yes.

3 MR. SUTHAR: Yes. That's when I will get the
4 applications, and that's when we'll start the permitting
5 process is when they send in the applications for that
6 and the actual construction begins, and that's what it
7 takes off from.

8 MR. CAHNOVSKY: Right now everything is just on
9 paper.

10 MS. ANDRIA: Thank you for clarifying that. I
11 wondered whether -- another thing, in the permit, it
12 asks them -- or it tells them that they must develop a
13 monitoring program, and it really seems kind of mind-
14 boggling that they have not had to do that before. Is
15 this the first time they're being required to develop a
16 monitoring program?

17 MR. SUTHAR: Can you tell me which specific --

18 MS. ANDRIA: I think it's Page 26, 27.

19 MR. SUTHAR: You're talking about the leak
20 detection and repair program, is that what we're talking
21 about?

22 MS. ANDRIA: I think there's also another spot
23 where it talks about asking them to develop a monitoring
24 program, and this application was submitted in 1996.

1 It's all -- it's 2004. I was wondering if there hasn't
2 been one developed by now, and should they have, and
3 should not it be -- should not we be able to see it and
4 comment on it, and should it not be made a part of this
5 permit?

6 MR. SUTHAR: Actually, they already had this
7 program before, because I remember reading the previous
8 state permit for this particular unit that they had, and
9 this program was already included in that particular
10 state operating permit that they had previous to my
11 drafting this Title V.

12 So what I did was I took that language, to keep
13 it consistent and keep it within this Title V permit in
14 this unit. So I actually took it from the state permit
15 that it existed in, and I put it in here, because I
16 didn't want to just take that language out and, you
17 know, like they didn't have to do it anymore.

18 MS. ANDRIA: But should it not, then, be -- I
19 mean, if they have one, shouldn't the program, the
20 monitoring program, be there, because it's a Title V
21 program which is enforceable by the public, and if we
22 don't know what it is and don't -- can't even tell from
23 the draft permit whether it's even been developed yet,
24 it seems that it needs to be in here.

1 MR. SUTHAR: We -- we usually do not put -- I
2 mean, if we included all the plans and all the details
3 of every plan in these documents, we'd be looking at a
4 stack like that, so I think -- this should be available
5 to you through our records or a FYI request. But as far
6 as I know, this already has been taken care of because
7 it was already part of a state operating permit.

8 MS. ANDRIA: Then I think the language should
9 be changed to read, a program has been developed, and it
10 is available at the office of the Illinois EPA, or
11 something like that, so people know, because we -- we're
12 supposed to look at this and to be able to tell what it
13 is that they're doing, what it is that you're requiring
14 them to do, and for us, the public, to be able to
15 enforce it, and it's -- I mean no disrespect to you.

16 MR. SUTHAR: No, sure.

17 MS. ANDRIA: Because these things are very
18 difficult, and I can imagine it's much easier for you,
19 an engineer, but for us, it's very confusing in trying
20 to see what the regulations are, and then when we have
21 something that's really pure English like, it's not been
22 developed yet, then it's -- we'd like it to be as simple
23 as possible.

24 MR. SUTHAR: I understand your question, I

1 really do, and I'll check into putting language in here
2 that makes that a little clearer for everyone.

3 MS. ANDRIA: And, also, for the record, we --
4 we would like a copy of that, and I'll send a FYI
5 tomorrow. We want an opportunity to review it before
6 the public comment period is over. And then by
7 incorporation, it would be in this permit, correct?

8 MR. SUTHAR: I can check into that for you.
9 Like I said, we're usually not -- we usually don't
10 include plans, as far as specific language of the plans,
11 within the permits. We try to keep a generalization,
12 because if we included every plan, like I say, we would
13 have a permit that would probably look like an
14 encyclopedia or something, but I'll definitely check
15 into that for you and get back with you.

16 MS. ANDRIA: Okay. Thank you. Also, just for
17 my own curiosity, do the companies decide what's in a
18 monitoring program or does the Agency?

19 MR. SUTHAR: It's really dependent upon the
20 rules and regulation that are applied to them, and the
21 rules and regulations usually stipulate what monitoring
22 is required.

23 MS. ANDRIA: In this case, for a bulk storage,
24 who decides? It kind of indicates that they can decide.

1 Is that the case for this?

2 MR. SUTHAR: In particular, what?

3 MS. ANDRIA: The monitoring program, where are

4 the parameters, who decides on the parameters?

5 MR. SUTHAR: Basically, you can say that they

6 decide, but they have to meet these requirements that

7 are stipulated out of 7.2.7. All the monitoring

8 requirements that are in there, they have to fulfill

9 those requirements. Their programs have to abide by the

10 requirements that we've put in there and any reference

11 to any rules which might stipulate what that program

12 must entail.

13 MS. ANDRIA: You said that you looked at the

14 other permit, another permit, to bring the language into

15 this permit. Did you check all of their permits?

16 MR. SUTHAR: I did. Prior to drafting any

17 Title V permit, an analyst usually goes through -- has

18 to go through every existing permit for that facility,

19 which ones are, you know -- which ones are still in

20 existence, which one might be out of service now. We

21 have to evaluate each permit before and then bring

22 those -- the pertinent information into the Title V

23 permit.

24 MS. ANDRIA: Did you check the records for any

1 modification of any of the tanks?

2 MR. SUTHAR: Could you repeat that question
3 again?

4 MS. ANDRIA: Did you check, in checking all of
5 the emission units and the tanks, did you check to make
6 sure that there were -- they were the same here as they
7 were in the other older permits?

8 MR. SUTHAR: What I did was I looked at the
9 older permits that were in existence, and then we can't
10 forget that they also provided me an application with
11 the most current emission units, and so I compared, and
12 I took the information that was in the application and
13 put those units to be permitted in this permit.

14 MS. ANDRIA: We have an exhibit here that we
15 would like to give you. It's from 1978, their tank
16 farm, and it's tank designation 10-7. On this exhibit
17 of theirs to an earlier permit, it has that as having a
18 fixed roof, and now it's listed as an internal floating
19 roof, and is that a modification, and should the tank
20 now be covered under NSPS?

21 MR. PUNZAK: When you install a floating roof,
22 that's considered to be something that -- now there was
23 a rule that required the floating roof that came in, but
24 when you install it, that's not called a modification

1 because it's reducing emissions. And by definition, a
2 modification is an increase in emissions, so it does not
3 become a modified tank subject to NSPS when you add an
4 internal floating roof.

5 MS. ANDRIA: Is that a rule for everything,
6 that if you change it and it has less emissions, because
7 I never knew that rule.

8 MR. PUNZAK: I can't -- I don't want to be
9 totally universal, but in general, it's very, very,
10 almost universal.

11 MS. ANDRIA: I'm all for any kind of anything
12 that has less emissions, believe me.

13 MR. PUNZAK: Right. They don't want to make
14 them subject to extra stringent things when they're
15 putting them in to reduce emissions.

16 MS. ANDRIA: And that's only one of those, so
17 we would prefer not having to look ourselves through all
18 these things, so if anything else -- we have -- there's
19 a couple of secondary seals in 1947 that didn't exist.
20 Is that the same thing?

21 MR. PUNZAK: Right, that's the same thing.
22 Secondary seal is another form of something that reduces
23 emissions, and installing secondary seals does not make
24 it subject to additional -- new source performance

1 standards.

2 In fact, the secondary seals is what the NSPS
3 would require, anyway. So they're really complying with
4 the NSPS, but it doesn't say there they have to. But,
5 in effect, they really are meeting the same standard as
6 the NSPS.

7 MS. ANDRIA: Are there other formations that
8 have been upgraded than these two, do you know? Does
9 anyone know?

10 MR. PUNZAK: I'm not -- I'm not working on that
11 specific permit. I was answering a general question.

12 And, also, we've gone over this one, but I
13 would like to -- this term monitoring is a word that
14 comes around, and I thought I would explain. It's a
15 general term that means a lot of different things.
16 Sometimes we use it to mean, for instance, if you have a
17 flare, and you want to make sure the flare has a flame,
18 you call that monitoring, where you put in something
19 that detects that there's a flame, we call that
20 monitoring.

21 But when you're dealing with leak detention and
22 repair, we sometimes -- what they have to do is several
23 times a year they have to go around with a little device
24 that measures whether there's any leaks coming out of a

1 valve or something like that, we sometimes refer to that
2 as monitoring. So you have to be very careful with the
3 word monitoring. It can mean completely -- a very broad
4 range of meanings, depending on the context.

5 MS. ANDRIA: Is there a different between
6 testing and monitoring?

7 MR. PUNZAK: Yes. I usually -- generally, when
8 we use the word testing, we mean checking a stack and
9 finding out what the emissions are. We would not
10 generally call that monitoring.

11 MS. ANDRIA: If -- since these were upgraded,
12 then, are there some that haven't been upgraded, Sinil?

13 MR. PUNZAK: He might be able to answer it but,
14 in general, I would say we have a rule that covers the
15 whole east side of St. Louis that requires certain tanks
16 to have the secondary seals and floating roofs and so
17 on, and that applies to essentially all tanks with vapor
18 pressures that are higher at a certain point. For
19 instance, gasoline has a higher vapor pressure. It
20 evaporates real easy. So any tank like that is required
21 to have that type of equipment on it.

22 MS. ANDRIA: You know, one of the things I
23 learned today in looking at this permit, I tried to find
24 out because there are pieces of the permit that require

1 certain kinds of testing and certain kinds of inspection
2 and that kind of thing, but I couldn't find anything
3 that inspected the exterior, the structure of the tanks.
4 And these tanks, some of them have been constructed in
5 1941, most through the 40's and the 50's.

6 And I -- I called EPA and was told that they
7 don't inspect the exterior of tanks because it's a
8 product, but that the fire marshall may do that.

9 I called the fire marshall's office, and they
10 said that they only inspect them in the beginning when
11 they're new, before they're installed, and that maybe it
12 was the American Petroleum Institute that inspected
13 them.

14 So I called the American Petroleum Institute,
15 and they -- they said that they don't inspect them.
16 They just write the standards for them. And I said,
17 Well, who does inspect them? And he said, Probably no
18 one.

19 And I think that's just absolutely a hole in
20 the law that needs to be addressed very quickly, because
21 for a town like this to be living over a plume of
22 gasoline with a possibility of leaking tanks and no one
23 is inspecting them from the actual structural integrity
24 of the tank, that just seems to me really outrageous.

1 MR. PUNZAK: Well, they're more likely not to
2 be leaking right at the exterior but along the bottom,
3 somewhere along the line. In other words, if they have
4 a concrete bottom or something and steel, you may have
5 it, and I believe they -- I don't know. I would have to
6 ask the company if they empty these tanks once in a
7 while and inspect them for integrity like that.

8 That is more -- that might get more into the
9 issue of the ground problem, rather than an air problem,
10 because I mean, I realize eventually, of course, when it
11 gets into the water and comes into your home and you
12 smell it, but it's not really evaporating directly into
13 the air.

14 MS. ANDRIA: Yeah, there's such a -- it's very
15 difficult to address this because the -- it's my
16 understanding that you've been down this road, the
17 Agency's been down the road about tying water, to air,
18 to, you know, the whole thing, because the tanks, when
19 they leak, they go down into the land, which goes to the
20 water, which comes up in the air, and everybody keeps
21 saying it's not my table.

22 And this is really, it's something that needs
23 to be addressed as a whole, and we need to go through
24 that process again, because it's just -- it's not

1 acceptable to have tanks sitting there. I mean, we see
2 corrosion.

3 There was a tank that corroded in Granite City
4 that had problems. I mean, tanks do corrode, you know,
5 and I think that this is -- we've got to find some way
6 to require inspection of the structural integrity of the
7 tank. Anyway, that was a comment, not a question.

8 MR. PUNZAK: Okay.

9 MS. ANDRIA: So, Sinil, in your -- back to the
10 tanks. It 1983, there were a bunch of different tanks,
11 96 storage tanks for non-volatile organics, floating
12 storage tanks, other types of tanks, and I don't see any
13 of those now. What happened to them all, and are any of
14 them included in this?

15 MR. SUTHAR: If they're not included in this,
16 then they probably are not in use, in operation anymore.
17 They wanted to -- in the application, they indicated
18 which tanks were in operation, which were in use, and
19 those were the ones that they wanted me to include in
20 the Title V permit.

21 MS. ANDRIA: If they -- you mean there's some
22 that they don't have to include in the Title V program?

23 MR. SUTHAR: Well, if they've been removed from
24 operation.

1 MS. ANDRIA: Now do they have the ability to
2 bring those back into --

3 MR. SUTHAR: Not without going through the
4 permitting process, no.

5 MS. ANDRIA: And what kind of permit?

6 MR. SUTHAR: Well, it would really depend on
7 what they're going to do. I mean, are they going to
8 start up using a tank that was existing already? I
9 believe that would still constitute going through the
10 construction permit process, because I am setting limits
11 in the permit already for the existing units, and to
12 bring in another unit, we may be talking about changing
13 limits and whatnot, we're talking about whole new
14 construction. I cannot just take a unit and put it in
15 here and say, hey, it was already existing X years ago,
16 and now you can just bring it back in. I can't do that.
17 The rules don't allow for that.

18 MS. ANDRIA: That's good to hear. I have a
19 letter here that I'm going to give to you, also. It's
20 from Clark dated 1992, and it says that it's to the
21 Agency, Attached is additional information you have
22 requested for our finished product tankage. And it's
23 got some information here, and it's really quite
24 detailed.

1 And I was wondering why there's not the level
2 of detail in this permit, the Title V permit, and is
3 this data no longer of interest to the Agency or does
4 it -- are you requiring it and just not showing it to us
5 like the monitoring program, or what?

6 MR. SUTHAR: Initially, I can say that I'm
7 going to have to look at this, because I've never -- I
8 don't recall coming across this document, and I'll have
9 to look at it, but I'm going to assume -- I'm going to
10 use the benefit of the doubt here and say that these
11 tanks are probably not in operation anymore.

12 MS. ANDRIA: Okay.

13 MR. SUTHAR: Which is why they may not be in
14 this Title V permit, and they probably were not included
15 in the Title V application that I received from the
16 facility. So I'm going to say that for right now, but I
17 would like to go back, if you allow me, and I'll check
18 into -- you know, I'll check in more detail as to why I
19 don't have corresponding numbers or I don't have these
20 tanks.

21 MS. ANDRIA: And we would appreciate prompt
22 action so that we would be able to have a chance to
23 comment on it.

24 MR. SUTHAR: Sure.

1 MS. ANDRIA: Have you streamlined these
2 documents into this -- I mean, you know what
3 streamlining means?

4 MR. SUTHAR: Yes. I've tried definitely, to
5 take any important pertinent information that needed to
6 be permitted or whatnot, that's exactly what each
7 analyst tries to do. They try to look through every
8 record, every existing permit, and to see where it falls
9 into this Title V and how it corresponds, if it does, to
10 the application that the company submits.

11 Now if it's not in the application, there's got
12 to be some trail that says these tanks were not -- are
13 not in use anymore. There probably is.

14 MS. ANDRIA: I've joined Verena Owens of Lake
15 County Conservation Alliance in asking, please, for a
16 Statement of Basis. It's required in the Title V
17 training I took from USEPA. They told us it was
18 required, and the State of Illinois is not doing it.
19 You have kind of an intro, but all your intro was, the
20 summary, was just two pages straight from the permit.

21 So I think a lot of our questions could have
22 been answered and addressed in a Statement of Basis. It
23 would be very helpful, you know, what makes this source
24 unique, what have you done to get here, why you're

1 giving them a permit, and a listing of the existing
2 permits would be very helpful, and also the compliance
3 history. I mean, it's really difficult for -- for us to
4 go and to FYI everything, and it's like this whole game,
5 where if it were just part of the process, it would be
6 really very helpful.

7 Are they in compliance? Is this facility in
8 compliance?

9 MR. SUTHAR: As far as I know, yes. With the
10 rules and regulations that were in the Title V, they
11 have provided certification that they are, yes.

12 MS. ANDRIA: It's a little difficult to tell
13 because it's not separated out from the refining. The
14 material that is available to the public right now, it's
15 altogether, so it looks like they're in violation. So
16 it would have to be -- you know, we would have to look
17 at it to see that, but I trust you've done that.

18 MR. SUTHAR: In violation of?

19 MS. ANDRIA: Emission standards, what they were
20 given, how much emission, and it was over.

21 MR. SUTHAR: You're saying as far as the
22 emission limits that are in this permit, is that what
23 you're specifically asking?

24 MS. ANDRIA: No, I said I could not tell. I

1 could not separate out the bulk storage from the
2 refinery, and we would need to do some more work to get
3 information if there is -- if there are exceedences, and
4 I don't know, I haven't seen any record of -- that you
5 actually test, so I'm not sure how you would find out.

6 Okay. I'll go on.

7 MR. SUTHAR: Could I say one thing in response
8 to that?

9 MS. ANDRIA: Sure.

10 MR. SUTHAR: They are required to send in an
11 annual emission report every year, and that would be a
12 good indication. I don't know if you've gotten a chance
13 to look at any of their annual emission reports, but
14 that would be a good indication of, you know, where
15 we're at as far as emission limitations are concerned.

16 Like I said, I'm not sure if you have had a
17 chance to look at any of the past annual emission
18 reports that they submitted, maybe the most recent one.

19 MS. ANDRIA: And they've been compliant with
20 all of their monitoring program that we have been -- all
21 of the things that were in that?

22 MR. SUTHAR: As far as the certification says
23 to me, yes, they are.

24 MS. ANDRIA: Which emission sources will

1 eventually have a CAM plan?

2 MR. SUTHAR: I'll have to look at their
3 calculations of potential to emit, but I want to say
4 most likely Unit 7.1 and possibly 7.2.

5 MS. ANDRIA: I would appreciate it if you could
6 look and also get that to us as soon as possible,
7 because we couldn't find it.

8 MR. SUTHAR: Sure.

9 MS. ANDRIA: Why are HAPs not listed?

10 MR. SUTHAR: This is -- if you look in 5.1.2 of
11 this permit, this source is not a major source of HAPs,
12 and so putting -- or listing specific HAP requirements
13 is -- there's -- the rule, I cannot do that. If they're
14 not a major source of HAPs, I cannot --

15 MS. ANDRIA: I mean, I've seen permits where
16 they have them listed, but it's not a major source in
17 terms of triggering a permit, but I think -- you know, I
18 think they should be listed. I mean, this town has got
19 a lot of Benzine going. Dan wants to --

20 MR. PUNZAK: In their annual emission report,
21 they're required to list their HAP emissions, every year
22 that they submit one. That information is also
23 available, you know, whenever they submit it. They have
24 to submit those by May 1st, and so you can get a copy of

1 it. And it goes from -- it's a calendar year so, for
2 instance, the 2003 report would have been submitted in
3 April of 2004 and would be available, and they have to
4 list all their HAPs, and we verify that their -- when
5 they said they weren't major for HAPs, we look at what
6 their annual reporting is and make sure that they
7 aren't, that they haven't gone over the -- and aren't
8 now major for HAPs.

9 MS. ANDRIA: Is it possible to get, since there
10 are a lot of times when I go through here, and I go
11 through here daily, that I -- and it's not raining,
12 because I know that the rain does bring the vapors into
13 the homes, and you can smell it all through the town,
14 but there's also an almost omni present smell. And when
15 I've called the Collinsville office, they usually tell
16 me it's the tanks.

17 Is there a way that we can put a Benzine
18 monitor on the -- can that be required -- on the fence
19 line or something to monitor?

20 MR. PUNZAK: Generally HAPs are only about 4 to
21 6 percent of total gasoline emissions, so -- and Benzine
22 is usually only a small fraction of that. I think it
23 would be almost impossible, even if we could set up such
24 a monitor, to detect them or something like that.

1 MS. ANDRIA: What are we smelling then?

2 MR. PUNZAK: It's just -- gasoline is a
3 mixture, probably 30 different chemicals. Most of them
4 are straight hydrocarbons, and then some of them are
5 these chemicals like Benzene, Toluene, Ethylbenzene and
6 so on. But, again, those ones perhaps only make up 4 to
7 6 percent of the total gasoline, and the rest is just
8 straight hydrocarbons which smell but aren't necessarily
9 HAPs.

10 MS. ANDRIA: If you were to put a monitor, one
11 monitor, there isn't one thing that you think would be
12 best to be monitored for? There's not a VOC monitor
13 that would encompass lots of things or --

14 MR. PUNZAK: What we generally monitor for is
15 there's actually not a specific rule that says
16 hydrocarbons can't be above a certain point. What we
17 call it is, in the summer, the mixture of hydrocarbons
18 in the air and the sunlight combine to form an ozone,
19 which is the standard -- which is the state standard for
20 measurement of ozone, so if -- if the ozone is low, that
21 indicates, in general, that the hydrocarbons aren't real
22 high, but that doesn't indicate that -- I mean, that
23 doesn't mean that you won't smell them or something like
24 that.

1 MS. ANDRIA: Well, Madison County, where this
2 is located, is non-attainment for both 1-hour and
3 8-hour, it violates both. It's non-attainment for
4 ozone, and since VOC's is a contributor, I think would
5 be good if -- to my knowledge, there's not a VOC monitor
6 anywhere in this refinery area.

7 MR. PUNZAK: Well, it's because VOC is such a
8 broad range of a mixture of things, it's hard to -- I'm
9 not even sure if they know of any monitor that detects
10 that. Sometimes they have them that will detect them in
11 the percent range, you know, 1 percent, but we're still
12 dealing with -- even if they're contributing to ozone,
13 you're still talking about the parts per million range,
14 which is very hard to monitor the hydrocarbons in that
15 low a range.

16 MS. ANDRIA: One of the places in the -- and
17 I'm sorry, I don't have the reference to it. I went
18 page by page, and it would take me a while to find it,
19 but you talk about changes in the materials stored in
20 the tanks. What other than gasoline is stored? What
21 cannot be stored?

22 MR. SUTHAR: I think that whenever I talk about
23 changes in the materials stored, I still refer to all
24 materials that are stored, they still have to comply

1 with each of the applicable regulations that I've listed
2 earlier in that section, and so we're -- it may sound
3 like they can put anything in there, but really they
4 can't. They still -- anything, any item that they put
5 into those tanks still has to meet the requirements of
6 any rules that apply, and anywhere you see that
7 language, it still refers to anything -- any material
8 that meets the requirements of 7.whatever.3, you know.

9 I cannot tell you -- I can't give you specific
10 names of what could be put in there, but we wouldn't
11 necessarily go for a name. We would -- an inspector who
12 went out there would look for the material and what the
13 properties of that material would be.

14 MS. ANDRIA: Are they marked with a label on
15 the outside, like so that if some accident would happen,
16 a fireman coming would know what's in the tank, or are
17 they just marked somewhere in the agency and with the
18 office of the --

19 MR. SUTHAR: They should be definitely with the
20 office. I'm not sure what the practice is, generally,
21 of the facilities, as far as the actual tanks go, when
22 you go out there and look at the tank. I want to guess
23 that it's probably hard to label each tank with whatever
24 material is in there. I mean, especially in the case

1 where there might be different materials stored. But I
2 definitely know for a fact that they should have a
3 record of what's in each tank, how much, and what type
4 of properties of each.

5 MS. ANDRIA: Yeah, I have no idea if there
6 would be a difference in how you would treat a fire with
7 naphtha, which is one of the things they can store, than
8 diesel fuel or gasoline, I don't know, but I hope that
9 someone's looking at that.

10 Again, in another old operating permit, we
11 found a lot of things about wind speed and seal factors
12 and through put, and we don't see any of these, and we
13 wondered if they still have to report them or are they
14 just in a permit that has been streamlined so we just
15 don't see it?

16 MR. SUTHAR: Probably streamlining, but I would
17 like to look at that document, if you have a copy of
18 that, just so I can see what contents you're talking
19 about.

20 MS. ANDRIA: Okay. Is there a containment
21 system?

22 MR. SUTHAR: Containment system for any leaks?

23 MS. ANDRIA: For leaks.

24 MR. SUTHAR: From the tanks?

1 MS. ANDRIA: Right.

2 MR. SUTHAR: Well, they're required -- they're
3 required -- they have specific control requirements for
4 each tank. If you look at 7.whatever.5 that refers to
5 tanks, you can look through, and there's a requirement
6 as far as control goes, they're supposed to check, you
7 know, for example, floating roof which rests on the
8 surface of the VOL.

9 MS. ANDRIA: Wait a minute. I can't hear.

10 MR. SUTHAR: I'm reading, for example, 7.3.5a,
11 and it stipulates that each affected tank shall be
12 equipped with the following: A floating roof which
13 rests on the surface of the VOL that is equipped with a
14 primary seal.

15 Just going down the whole list there from a to
16 e, it has requirements of what this tank is supposed to
17 entail as far as control requirements go, even operating
18 requirements, each --

19 MS. ANDRIA: I'm talking about something that
20 if there were leaks below, is there a containment from
21 the structural --

22 MR. PUNZAK: That -- that's generally not
23 addressed by air. Again, that's water. Every tank is
24 required to have what they call a dike. In other words,

1 if you go out there, they're usually -- you see almost a
2 wall of dirt that go up, and that's required to be large
3 enough to contain -- if the whole tank ruptured, you
4 know, and the whole 100,000 barrels leaked out, that
5 dike has to be large enough to contain that whole
6 100,000 barrels so it doesn't go down the street or
7 something like that. And then, of course, they'd be
8 required to clean it up, but that's major things.

9 Again, in terms of if there's a small crack
10 underneath the thing, there isn't really anything that
11 air requires. You know, if the bottom of the tank is
12 leaking, we don't have any air requirements to address
13 that. I'm not sure if any other people do or not.

14 But I'm sure the companies, they probably --
15 since they would be losing product, they would tend to
16 want to make sure that doesn't happen, and a lot of them
17 do empty the tanks every few years to double-check the
18 integrity of the bottom.

19 MS. ANDRIA: It seems like something like that
20 should be in a Title V permit, too, if it's addressed by
21 water or land, I don't know, but it seems like that
22 should be incorporated. I know that they incorporate --
23 don't they incorporate RCRA into Title V when there's a
24 RCRA requirement?

1 MR. PUNZAK: No, we don't have any RCRA
2 requirements in Title V permits.

3 MS. ANDRIA: At the Onyx hearing, it was
4 wrapped into the Title V, the RCRA permit, Mara?

5 MARA MCGINNIS: Yeah, that was because of the
6 incinerator and the emission limits were also RCRA feed
7 limits, they had to be coordinated.

8 MR. MATOESIAN: I believe that was two separate
9 permits, were they not? It was a joint hearing.

10 MARA MCGINNIS: But the emission issues were
11 coordinated between the two parts of the Agency.

12 MR. MATOESIAN: I see.

13 MS. ANDRIA: Could we talk about the wastewater
14 treatment plant? I've been to two hearings with regard
15 to wastewater treatment. One was the Conoco Phillips
16 permit, the construction permit, and they had a
17 wastewater treatment plant, and then the City of -- or
18 the Village of Roxana, I believe, had another prior,
19 that they were talking about the wastewater treatment
20 plant.

21 But my understanding was, and if I'm wrong,
22 then please correct me, but that there was still going
23 to be refinery output into the wastewater treatment
24 plant; is that correct?

1 MR. MULKEY: We are only getting rainwater. My
2 understanding is, I haven't dealt with it, but my
3 understanding is what we're getting is rainwater run-off
4 from the refinery, you know, the operation units of
5 Conoco.

6 MS. ANDRIA: In case you couldn't hear, he said
7 that they're only getting rainwater run-off from the
8 refinery.

9 Chris, do you know why?

10 MR. CAHNOVSKY: No. I was under the impression
11 that Conoco Phillips is using the Premcor plant in the
12 interim, until they get their -- their connection to
13 their plant on the other side of the fence.

14 MR. MULKEY: They have that already. All
15 process water goes across the street to the Conoco
16 Phillips Refinery.

17 MR. CAHNOVSKY: So that's been done already.

18 MR. MATOESIAN: Okay. Hold on one second.
19 Did you get all that? Okay.

20 MS. ANDRIA: Is there -- does the run-off water
21 from Premcor, then, I mean from the old Premcor
22 Refinery, goes into the existing Premcor wastewater
23 treatment plant, the run-off?

24 MR. MULKEY: That's correct.

1 MS. ANDRIA: Okay. Seems to me that that would
2 require an NPDES in addition, because it's -- one would
3 assume, since there's contamination in the town, that
4 there would also be contamination on the site. There's
5 no water person here?

6 MR. CAHNOVSKY: They have an NPDES permit for
7 that.

8 MS. ANDRIA: But this is saying this is not
9 being treated as coming from a refinery, but yet it's
10 going over land that is a refinery. It's coming --
11 whatever rainwater comes onto tanks and equipment and
12 refining equipment and comes down and comes off, I think
13 that that -- I'll look into it, but legally, I think
14 that that's coming from a refinery.

15 MR. CAHNOVSKY: They have an NPDES permit for
16 that treatment plant. The water flows -- the two
17 equalization tanks that's on here, the water flows into
18 that, and then from there, it goes to the DAF unit, and
19 this is all primary separation. And then from the
20 primary separation, it goes across the road, in the
21 refinery, to secondary wastewater treatment plant, which
22 is your aeration units and clarifiers and your
23 biological, and then it gets put in a pipe and goes out
24 to the river, is that fairly accurate, and that's

1 covered under an NPDES permit?

2 MS. ANDRIA: There are no specific emission

3 limits on that, and is the water treated there?

4 MR. CAHNOVSKY: In the refinery, yes.

5 MS. ANDRIA: On the ground, before it goes into

6 the wastewater treatment plant?

7 MR. CAHNOVSKY: No.

8 MS. ANDRIA: Is there an oil/water separator?

9 MR. CAHNOVSKY: Yeah. That's the primary

10 separation. That's the first part of this, which is the

11 two equalization tanks and the solid air flotation unit,

12 that's the oil/water separation, and then that oil goes

13 back into this tank 510 over here and then goes back

14 into the refinery.

15 MS. ANDRIA: Okay. We need to look at that

16 more.

17 I think I asked part of this question, but I

18 didn't ask the follow-up on that. The maximum

19 theoretical VOM's, is it added into the fee structure

20 and how are they measured?

21 MR. SUTHAR: Kathy, can you repeat that one

22 more time?

23 MS. ANDRIA: The maximum theoretical VOM's in

24 there, it's got -- and I don't have the reference to the

1 number, it says, less than so many, and I wondered how
2 much less than, is it added into the fee structure, and
3 how are they measured?

4 MR. SUTHAR: I'm going to assume when you're
5 talking about this theoretical, are you talking about
6 some emission limitations summary, is that what you're
7 talking about, or are you talking about the actual
8 calculated emissions?

9 MS. ANDRIA: The actual.

10 MR. SUTHAR: From their application?

11 MS. ANDRIA: Right. And then, I mean, you said
12 before that you had no HAPs because they were not of
13 sufficient --

14 MR. SUTHAR: They were less than the threshold
15 that, you know, 10 tons single HAP and then a
16 combination, and they did not meet any of those
17 requirements, and that's why I don't have them
18 specifically listed.

19 MS. ANDRIA: And the VOM's, the same?

20 MR. SUTHAR: Well, they're major for VOM.

21 MS. ANDRIA: But they're not -- are they added
22 up? Are they put into the fee structure? I don't think
23 they were in the fee structure. Maybe I just missed it.
24 I did, maybe.

1 MR. SUTHAR: 5.5.1, I think is that what you're
2 looking for?

3 MS. ANDRIA: It's 230 tons, right?

4 MR. SUTHAR: Yes.

5 MS. ANDRIA: Okay. I think I've gotten two
6 notes mixed up. I wanted to look through my notes and
7 wondered if anyone wanted to ask questions while I
8 reorganize. I don't have many more questions, and I
9 thank you for your patience in my questions.

10 MR. MATOESIAN: Did you want these two letters
11 entered into the record?

12 MS. ANDRIA: Yes, I did.

13 MR. MATOESIAN: Okay. I will list the sheet
14 labeled Tank Farm as Exhibit 1, and the letter from
15 Clark Oil as Exhibit 2.

16 Thank you. The next speaker is Kathleen Logan
17 Smith.

18 MS. SMITH: I'll wait.

19 MR. MATOESIAN: Okay. The next speaker is
20 Jim Bensman.

21 We'll take a 5-minute recess first, actually.

22 (A short break was taken.)

23 MR. MATOESIAN: Okay. We'll go back on the
24 record, then. The next speaker is Mr. Jim Bensman.

1 MR. BENSMAN: Hello, my name is Jim Bensman. I
2 live about two miles from here, so I'm concerned about
3 the pollution from here.

4 MR. MATOESIAN: I'm sorry. Could you just
5 spell that, please.

6 MR. BENSMAN: B-e-n-s-m-a-n.

7 MR. MATOESIAN: Thank you.

8 MR. BENSMAN: Like I said, I live a couple
9 miles from here, so I'm very concerned about the
10 pollution. I smell it all the -- quite a bit, so it
11 worries me. I'm also the conservation chair for the
12 Piasa Pallisades Group of the Sierra Club, and we have
13 about 500 members in the general area, a few counties
14 around here.

15 And, you know, like I said, there's a lot of
16 pollution issues here, and we need to make sure that
17 you're protecting the public from the pollution and take
18 a close look at these permits, because there's been a
19 lot of problems here over the years, so these are
20 important areas to keep careful track of and make sure
21 the problems that have occurred in the past, aren't
22 occurring again.

23 And the final thing I just want -- I was glad
24 to see this time you had a map and marked where this is,

1 but it would be helpful next time if you also mark what
2 all the other stuff is around here, because that's
3 what's always so confusing about this. There's so many
4 refineries down here, and there have been so many
5 changes of ownership, and you never know what what is,
6 so it would just be nice to know, so thank you.

7 MR. MATOESIAN: Thank you Mr. Bensman, and the
8 next speaker is Kathleen Logan Smith.

9 MS. SMITH: Hi, I'm Kathleen Logan Smith, with
10 a K, with Health & Environmental Justice, St. Louis, and
11 I have a couple of fairly general questions.

12 One of my chief concerns after this -- after
13 looking at this permit is -- and the answers that we've
14 received, that a lot of tanks may have been removed for
15 decommissioning, didn't appear in the application and
16 aren't addressed in this permit. Is there a
17 decommissioning process for tanks removed from
18 operation?

19 MR. SUTHAR: There is. There -- in the past,
20 when they had the state operating permits, what they
21 probably -- well, what they should have done was send in
22 a list of whatever tanks they are and submit them to our
23 records unit, asking them that these -- these units had
24 ceased operation.

1 Now in the interim, when they sent me the
2 Title V application, and if tanks have -- are not in use
3 anymore, companies -- I mean, sometimes people will
4 just -- they'll list the tanks that are in operation in
5 their application, and they'll say, well, the rest of
6 these have ceased operation, and I just go from the --
7 any analyst will just go from the application and put
8 that in the Title V permit.

9 So it depends on what time frame we're talking
10 about, if we're talking about pre -- you know, the time
11 frame before the draft has come into affect or the
12 balance is drafted, they might have sent in a letter to
13 the records unit. If the draft was coming up, the
14 analyst was working on it or was supposed to work on it
15 sometime in the future, they might not have done that.
16 They might have just put only the tanks that are in
17 working order in the application, and the analyst would
18 have used that information.

19 MS. SMITH: I'm just aware that with
20 underground storage tanks, that, you know, your local
21 convenience store has to go through a serious process
22 for, you know, old tanks and for new tanks, and they get
23 inspected, and that information is verified.

24 And so I'm wondering, since those tanks are so

1 much smaller than these tanks, if there's any kind of
2 process, whether the state has it, at some point these
3 things are inspected or, you know, that there's a
4 verification that, yes, this is off line, this is empty,
5 this is whatever it is, but that these tanks are no
6 longer in use, and if there's any way to -- or if that's
7 just something that's not addressed.

8 MR. SUTHAR: No, it is. That's why we have our
9 field operations section. Each bureau has it. Land has
10 it, water has it, so does air. We have our own
11 inspectors.

12 MS. SMITH: So the tanks would be under land?

13 MR. SUTHAR: They could be looked at by land
14 inspectors. They could be looked at by air inspectors,
15 also, you know.

16 MS. SMITH: Are they?

17 MR. SUTHAR: They are, yes, they are. And if
18 they have any problems, there's a procedure that these
19 inspectors follow. They might start up with a
20 noncompliance advisory letter, they might follow up with
21 a violation letter, and start a process through that.

22 MS. SMITH: When we're doing a Title V permit
23 like this one, where we're incorporating prior permits
24 and all existing emission sources into one permit, does

1 IEPA visually confirm the number and condition of units
2 in the permit and do an inspection, sort of a baseline,
3 to see that what's going into this permit is what should
4 be going into this permit and things aren't left out or
5 omitted, or is there any kind of cross-checking of,
6 like, you know, what's actually there versus what's on
7 paper?

8 MR. SUTHAR: That usually happens as soon as
9 this permit is issued. As soon as this permit is
10 issued, this -- this facility goes on a CAAPP field
11 inspector's work plan, and then he or she is out there
12 after a certain amount of time to -- with this permit in
13 hand, looking at all the emission units at that
14 facility.

15 MS. SMITH: So they'll be checking against this
16 permit?

17 MR. SUTHAR: Definitely. This is the tool that
18 they'll use when they go out there, and any
19 discrepancies are followed up on, like I said, for
20 noncompliance advisory, a violation notice, whatnot.

21 MS. SMITH: And you've said a number of times
22 that you've relied on certifications from the company
23 that they're in compliance with different programs, you
24 know, in drafting this permit.

1 MR. SUTHAR: They're required by the Clean Air
2 Act to provide us these certifications.

3 MS. SMITH: And my question is, a lot of these
4 compliance rates rely on self-reporting. So do we have
5 any data that indicates how accurate self-reporting is
6 with companies that are reporting their own compliance
7 issues, because my experience -- we were -- I worked
8 with incinerators mostly, and I have seen data that
9 companies don't do a very good job of self-reporting
10 violations, and when you go through and point out to the
11 agencies that, well, this was a violation or this wasn't
12 reported or, you know, we're getting excessive here, you
13 know, the companies don't report those things on their
14 own, unless they have to, I mean, unless there's
15 somebody else watching them. And so do we have any data
16 on the rates of, you know, how effective self-reporting
17 is?

18 MR. SUTHAR: I personally don't have any. I
19 mean, it looks like you're looking for a general
20 statistic, is that what you're looking for?

21 MS. SMITH: Yeah, generally, I think that
22 they're --

23 MR. SUTHAR: I personally don't know of any
24 figures. I don't know if any of my colleagues know of

1 any figures like that, but --

2 MS. SMITH: I mean, I'm assuming your
3 inspectors are going over the data on their own to see
4 if there was anything overlooked by the company.

5 MR. SUTHAR: Oh, sure, sure.

6 MS. SMITH: And that's how they find what
7 violations they do find. But my point is that when
8 you're drafting a permit, you're not there yet. If you
9 don't have inspectors out looking at this permit yet, it
10 will be a while before we catch anything. And if you're
11 relying on certain assumptions that were based on self-
12 reporting, it seems like that might be a hole that
13 should be addressed somehow.

14 MR. SUTHAR: Unfortunately, I mean, I think we
15 don't have enough manpower to go and look at every
16 facility. I mean, that's just the truth. I would love
17 to go to every facility. I'd love to go to Premcor
18 before they sent me the application and sit down with
19 them and look at absolutely everything, but we just
20 don't have the man -- I don't think we have. I'm not
21 speaking, you know, for other people here, but I don't
22 think we have the manpower to do that, and we have the
23 field --

24 MR. PUNZAK: I'm pretty sure that every --

1 every source that has a CAAPP permit is inspected at
2 least once a year, when you say -- so I mean, the permit
3 section can't go out, but the field inspectors are
4 required to go out, and that's in every one, like the
5 Conoco Phillips Refinery, they probably get at least --
6 probably at least six visits a year, probably, every two
7 months or something like that. Now each time they might
8 inspect something different. One time they may look at
9 the tanks, and another time they may look at the
10 heaters, another time they might look at some of the
11 process units or something like that, but they are --
12 and also these -- the self-reporting, I'm not saying
13 that that doesn't mean that it can't happen, but we have
14 now what we call a responsible official who has to sign
15 and say, I believe that this information is correct, and
16 if it's -- if it's -- I mean, every -- there can be
17 mistakes, and if he thinks, to the best of his
18 knowledge, it's correct, then they have to find out what
19 went wrong.

20 But, I mean, if he deliberately falsified it,
21 then he could -- he could go to prison for something
22 like that, for deliberately falsifying information like
23 that. And I do know people -- now this was the feds
24 that followed up, that there are people who are in

1 prison for falsifying a report sent to the EPA.

2 MS. SMITH: I just wanted to bring it up
3 because I've seen situations with incinerators that
4 self-reporting is just -- it doesn't quite get the job
5 done, and that a lot -- an annual inspection in some
6 places is not a surprise inspection, and so, you know,
7 they would call them up and say, we're coming to see
8 you, get ready, and the facility would clean up, and
9 they would get inspected, and everything would seem
10 fine, and so it's not -- my point is, you know, we've
11 got some holes.

12 MR. PUNZAK: Well, depends on what you're
13 doing. For instance, like an incinerator, a lot of
14 times they're required to have these, what they call
15 roll of paper, where the temperature of the incinerator
16 is, so we could go in there and look at that piece of
17 paper any time.

18 So, I mean, if we find that they -- you know,
19 it was in violation of a certain temperature requirement
20 and they weren't reporting it, then we would consider
21 that to be falsification, but there is some kind of
22 records required that we could inspect afterwards, not
23 just once it's -- in most cases, I'm not saying
24 everything is that way, but we --

1 MS. SMITH: This particular plant had 12-hour
2 data gaps in that piece of paper, but we'll go on and
3 stick with this. I'm done.

4 MR. MATOESIAN: Miss Andria.

5 MS. ANDRIA: Yes, I just had a couple more
6 questions, and actually I had more, but they were about
7 inspection, and Kathy Logan Smith did a wonderful job
8 asking those questions, and I really wish we could get
9 more money from the state legislature for the Agency to
10 go out on inspections and monitoring, and I know that
11 you've got some really fine people doing this, but we
12 don't have enough of you. And there's just -- there's
13 so many emission sources, and we here in the Metro East
14 are so, so over-burdened. We have so many emissions
15 here, and we are non-attainment, and we have terrible
16 health problems. Anyway, that's my little commercial.

17 I have a couple of questions. One, I wanted to
18 point out, it's kind of a humerus thing, but it's a very
19 sad thing, under 7.1.3b, The Applicability Provisions,
20 No person shall cause the discharge of -- you don't have
21 to look it up, Sinil -- blaw, blaw, blaw -- with the --
22 except for the following exception: If no odor nuisance
23 exists.

24 I mean, that really should be taken out because

1 it just doesn't apply here. That was just a little
2 comment.

3 Does any tank store MTBE here?

4 MR. SUTHAR: I'll have to review the
5 application, but -- maybe I can defer that question.

6 MR. MULKEY: I thought MTBE -- I'm not sure,
7 but hasn't that been banned in the State of Illinois?

8 MR. PUNZAK: I don't think it's around anymore.

9 MS. ANDRIA: I know it's not able to be put
10 into gas tanks, but I don't know, since the refineries
11 here also feed other states, and not all states have
12 banned MTBE, and there is a few years before they have
13 to, I would really like to know that, if the gentleman
14 from Premcor can check that, and are there any VOL's
15 stored other than ethanol?

16 MR. SUTHAR: In the tanks I have listed in this
17 permit, as far as I know, no. Now I could be wrong.
18 There could be other materials of similar properties
19 listed in -- in the tanks at the moment. But once
20 again, they have to be of similar properties and meet
21 the requirements of the rules that apply to those tanks.

22 MS. ANDRIA: Throughout the permit you have,
23 under the emission limitations, the phrase, There are no
24 specific emission limitations for this unit; however,

1 there are source-wide emission limitations in condition
2 5.5 that include this unit.

3 It seems to me that there's always the
4 potential for something to emit more, and that when you
5 do it for a whole unit rather than each, that the
6 potential for over-emitting is more great, and I was
7 wondering if it's possible to have individual limits or
8 is that not allowed?

9 MR. SUTHAR: I have -- wherever you see that
10 particular --

11 MS. ANDRIA: It's on Page 46, 7.4.6.

12 MR. SUTHAR: Yes.

13 MS. ANDRIA: I've seen it throughout the permit
14 through different things.

15 MR. SUTHAR: Right. If you look at the dates
16 of when these units were constructed, like, for example,
17 I'm looking at Unit 7.3, and looking at all the tanks
18 and the date constructed of each tank, and we're talking
19 pre 1970 period, so, basically, these are like -- these
20 are grandfathered in, and the new source review and any
21 emission -- I cannot put any emission limitations on
22 these because of the date of construction prior to
23 initiation of new source review.

24 MS. ANDRIA: I understand that. I was

1 wondering if there is such a thing as a tank shelf life?
2 I mean the earliest, I believe, was 1941. Is that --

3 MR. SUTHAR: You mean like an actual life span
4 of the tank?

5 MS. ANDRIA: Right. I mean, do they
6 automatically hit 62 and are retired or something?

7 MR. SUTHAR: Honestly, I don't know of any such
8 date. Once again, maybe I can defer this, if there is
9 such a thing, but as far as I know, there isn't.

10 MR. MULKEY: You talked earlier about the
11 American Petroleum Institute, and they write the
12 standards. They have a standard, API 653, which is tank
13 inspection requirements.

14 And, essentially, under most circumstances, you
15 get into the tanks every ten years. You do a complete
16 internal inspection of the entire tank. As long as you
17 meet the inspection requirement, you can return the tank
18 to service. You know, you could be below. And you
19 actually take measurements of thickness in steel,
20 measure the bottom of the tank, you know, you take
21 measurements all around the tank.

22 MS. ANDRIA: Do you do ultrasound?

23 MR. MULKEY: They use an ultrasonic thickness
24 gauge to measure the thickness of the steel, and they do

1 an inspection. And based on what you find, you can
2 return the tank to service for another ten years, or it
3 may indicate you need to do repairs to the tank. In
4 that case, you do repairs to the tank before you return
5 it to service.

6 MS. ANDRIA: When was yours last done?

7 MR. MULKEY: We stagger those inspections
8 because, again, you have an operating facility. You
9 can't take them all out of service at the same time, so
10 you basically cycle through those tanks, and you try to
11 get a few tanks every year do an API 653 inspection.

12 MS. ANDRIA: In the interest of goodwill to the
13 community, could you make those available to us?

14 MR. MULKEY: The API 653 inspections?

15 MS. ANDRIA: Yes.

16 MR. MULKEY: I will have to check. I don't
17 have a problem with it, but I got to run all that kind
18 of stuff through our legal group.

19 MS. ANDRIA: Do you submit reports to the IEPA
20 or USEPA?

21 MR. MULKEY: On the tank inspections?

22 MS. ANDRIA: Yes.

23 MR. MULKEY: I'm not really in that group that
24 does that. I'm more cleaning stuff up, so I'm not sure.

1 MS. ANDRIA: Thank you. We appreciate it if
2 you both could look into it and let us know. That is
3 all I have. I want to thank you very much for your
4 indulging my many questions, and we appreciate your time
5 in coming all the way down here in 114, 15, 16 something
6 heat index, and we appreciate that we were allowed to
7 have it in the basement where it's air conditioning.

8 MR. SUTHAR: Thank you.

9 MR. MATOESIAN: Thank you, Miss Andria. Is
10 there anyone else who would like to ask a question? If
11 you could, please approach the podium.

12 MR. JACOBY: I'm Don Jacoby, J-a-c-o-b-y. I am
13 a village trustee with Hartford. My question is this
14 reference on 7.8, the gas and storage wells, what
15 exactly are these gas and storage wells you're talking
16 about in this permit and how deep are they, and who
17 monitors them, because according to back here, it says
18 there is no testing requirement, no monitoring
19 requirements.

20 MR. SUTHAR: I'm sorry. Could I have you
21 repeat your question one more time?

22 MR. JACOBY: Yes, the gasoline storage wells.

23 MR. SUTHAR: Okay. 7.8?

24 MR. JACOBY: Right. How deep are these wells,

1 and who is monitoring these wells, and how do we know
2 that we're not getting more liquid from these wells into
3 the Village of Hartford?

4 MR. SUTHAR: Well, the facility should be
5 monitoring these wells. They have -- they should have
6 their own things they do for, you know, monitoring,
7 inspecting. It's not necessarily true that there are
8 things in this permit or there have to be things in this
9 permit. It should be on a goodwill basis and basic
10 operating procedure to be doing inspections and
11 monitoring on their own, also.

12 MR. JACOBY: What type of wells are these? It
13 says, gasoline tank wells, but what are they? Are they
14 storage tanks, underground storage tanks or --

15 MR. SUTHAR: According to their application
16 that I received, I was just -- basically, what's
17 described is gasoline tank wells, 300-gallon storage
18 capacity, basically.

19 MR. JACOBY: So they're storing 300 gallons of
20 gasoline underground, is that what you're trying to tell
21 me?

22 MR. SUTHAR: According to the description I
23 have, a contractor gasoline storage tank, gasoline tank
24 west of maintenance shop, gasoline tank wells, and I can

1 defer that question to the facility if they want to
2 elaborate on that.

3 MR. MULKEY: I don't know. I don't have a good
4 answer for that right now. I don't know myself. I
5 could check on it. As far as I know, we don't have any
6 underground storage tanks here. I thought these were
7 above-ground tanks, but I'll have to check on that and
8 find out.

9 MR. JACOBY: That's all I have.

10 MR. SUTHAR: What I put in here is according --
11 straight out of their application.

12 MR. JACOBY: Could you check into that and find
13 out what they're talking about when they say wells,
14 because a well, to me, is under the ground.

15 MR. SUTHAR: I remember -- I remember myself
16 wanting to list these as gasoline storage tanks, and
17 then the information, it was -- it was conveyed to me
18 that these were -- they wanted to describe these as
19 gasoline tank wells. Now that's the way I've done it,
20 according to rules and regs that was available to me,
21 and according to the description in the application that
22 was given to me, I couldn't go any other way with that.
23 I don't -- I'm not sure if we have a discrepancy here,
24 as far as what really exists or not. Maybe we need to

1 clear that up, if we could, with the facility.

2 MR. JACOBY: Thank you. That's all I have.

3 MR. SUTHAR: Definitely, I can check into that
4 some more and check into that.

5 MR. MULKEY: I'll check into it.

6 MR. JACOBY: Thank you.

7 MR. MATOESIAN: Thank you, Mr. Jacoby.

8 MS. ANDRIA: I just also wanted to thank the
9 gentleman from Premcor for coming and for being
10 responsive to our questions.

11 MR. MATOESIAN: Okay. Thank you. Do we have
12 any further comments or questions? Anyone?

13 All right. Then I'll adjourn this hearing.
14 Once again, on behalf of Renee Cipriano, Director of the
15 Illinois Environmental Protection Agency, the Agency
16 itself, and myself, I thank you all for coming. Good
17 night.

18

19 * * * *

20

21

22

23

24

1 STATE OF ILLINOIS)
) SS.
2 COUNTY OF MARION)

3

4

5

6

7

8 I, TAMMIE MCNEIL, a Notary Public and Certified
9 Shorthand Reporter for the State of Illinois, do hereby
10 certify that the foregoing is a true and correct record
11 of the proceedings and testimony given before the
12 Illinois Environmental Protection Agency at the Village
13 of Hartford Recreational Building, 715 North Delmar,
14 Hartford, Illinois, on the date of July 13, 2004.

15

16 IN WITNESS WHEREOF I have hereunto set my hand
17 and affixed my Notarial Seal this day of
18 2004.

19

20

21

22 Notary Public - C.S.R.

23

24

